

Coastal Pollution Remediation (CPR) Program Frequently Asked Questions

The following questions and answers are made available to all eligible municipalities in order to allow for a competitive and fair process. Any additional questions or requests for assistance in developing applications should be directed to the CPR Grant Coordinator and/or Technical Assistance Contacts listed in Appendix A of the CPR RFR.

Is there funding available for Stormwater Phase II Projects?

The CPR program is designed to remediate or investigate a specific stormwater pollution problem and not to meet any federal stormwater requirement. However, identification of a pollution problem and natural resource impacts (assessment), and proposals to remediate nonpoint source pollution are fundable projects.

If the pollutant of concern were known, would a fundable assessment project be to determine the presence or absence of the pollutant?

Yes. However, preference is given to proposals that include proposed remediation solutions, and plans up to 25% design. Targeted water quality testing may follow presence determination to further assess the nonpoint source problem. Please see the Assessment Funding section of the RFR for further information.

Would a proposed project in an inland community be given a higher rank than that from a coastal community?

No. All proposals are ranked on how well the proponent identifies the pollution problem and natural resource impact, and whether they have made a clear connection between the impact to the inland tributary and, therefore its impact to coastal waters.

Can a project be funded just based on the fact that it is on the 303(d) list of impaired waters or does the proposal have to discuss a natural resource impact or impairment?

No. In addition to noting the waterbody's 303(d) list status, the proposal must identify particular impacts to natural resources that is caused by, or suspected to be caused by, a nonpoint pollution source. Applications will be judged based on how comprehensively the applicant demonstrates and documents impacts to the receiving waters, and on how adequately the application links the impairment of the resource to the suspected pollution source. Please refer to the RFR

Can non-structural BMPs be funded under this grant program (e.g. outreach/prevention)?

No. Water quality assessments and implementation of BMPs are only fundable under this grant program, however these types of projects may be fundable under CZM's CPR Coastal NPS grant program.

Would co-applicants both need to submit paper work?

Co-applicants do not need to submit separate proposals. However, it is the responsibility of the project proponents to articulate the responsibilities of each municipality including fiscal and contract management. NOTE: Preference criteria for a joint proposal is described in the RFR.

Can potential applicants look at funded proposals from previous years?

Yes. They are public documents. Applicants cannot take copies of the documents, but they can review them in the CZM office.

Is the aversion of a potential pollution problem fundable under CPR?

No. The grant only funds the remediation or assessment of a pollution problem. BMP implementation associated with new development typically is regulated locally under the guidance of DEPs Stormwater Management Policy.

While the RFR is out, who can provide assistance in developing a CPR grant proposal?

In order to assure that there is no unfair advantage received by any particular municipality, state agencies are restricted in providing assistance once the RFR has been issued. However, a list of Technical Assistance Contacts (TACs), (appendix A of the RFR) has been provided who can provide assistance and guidance in developing proposals throughout the RFR process. Municipalities are encouraged to contact the TACs, as they are familiar with the program and the application process.

What is the timeline for project award announcement and project completion?

Applications are due no later than the end of June of each year. We anticipate that project awards would be announced in September. All projects must be completed by the end of the state fiscal year: June 30, 2005.

What project costs will the grant funds cover?

Typically all costs associated with completing the project except for the costs for submitting the grant application. These include, permitting and other applicable fees, consultant fees, equipment costs, material costs, laboratory analysis, and administrative costs. Keep in mind that a 25% match is required and many of these costs if paid for by the applicant can be counted as match.

What level of engineering plans are required to support an application?

For an implementation application, “conceptual” plans are required. A description of “conceptual” plans is provided in Section 3 Describe the Project Details of the application. There is no engineering plan requirement for assessment proposals as the development of a mitigation strategy and subsequent engineering design are based on the assessment. All implementation projects require professional engineer signed plans before project can proceed to installation.

Can the CPR pay for engineering plans prepared for a proposal submission?

No. Application preparation costs are not eligible for reimbursement. Generally any work completed before a project has been awarded and a contract is in place is not eligible for reimbursement. However, project specific costs, such as, engineering plans or water quality testing that have been completed after June 30 may be applied to the match commitment. Valid receipts must be provided to prove work was completed after June 30, 2005.

Can a project be a combined assessment and remediation?

Yes, although it may be difficult to perform an assessment and any subsequent implementation during the same grant cycle. All projects need to be completed by the end of the fiscal year (June 30, 2005).

Can a project contain more than one component?

Yes, but the project must be finished by the end of the fiscal year (June 30, 2005). See below.

As projects need to be completed by the end of the State Fiscal Year, does the program tend to favor smaller projects?

Applications have been rejected for funding if the selection committee determined that, due to the scale of the project, it was not likely that the project would be completed by the end of the fiscal year. If a municipality is considering a large-scale project, it may consider submitting the application as a phased project to be implemented over several years (or grant cycles). Such a phased proposal may be eligible for preference criteria points in the RFR. Generally, implementation grants have been between \$3,000-\$165,000 and assessment grants have been between \$10,000-\$35,000.

If a project, once awarded and under contract, cannot be completed by June 30, 2004, will a contract extension be granted?

No. All awarded projects are required to be completed by June 30, 2005. The municipality signs a contract and is obligated to finish the project within the fiscal year.

How much funding is going to be available in this grant round (FY 05)?

While we do not formally know how much will be allocated to the CPR Program under the state bond spending cap for FY05 until July/August, we anticipate that we will be funded at our past level of approximately \$600,000.

How many proposals are funded vs. the number submitted?

Over the past nine (9) grant rounds, approximately one-third to half of the proposals submitted have received funding, though the number of funded proposals varies from year-to-year based on the total amount requested and available funding.

If a single large-scale project is proposed, does the evaluation committee have the option to fund a smaller component of the project?

Generally, projects that are selected for funding are funded as requested. However, if the evaluation committee determines that, due to the scope of a project, it is not likely to be completed by the end of the fiscal year, it has the discretion to fund individual components or phases of the project. The applicant may then apply in the following grant round for funds to implement the remainder of the project. If a municipality is concerned that a proposed project may be too large, the municipality may wish to articulate discrete project tasks and associated costs in order to facilitate partial funding.

Could the BMP design and construction be combined in a single project proposal?

Yes. As the RFR application does not require submission of detailed engineering plans (conceptual plans only) the development of "Professional Engineering" plans is a standard component of any implementation project. If the municipality does not have sufficient information on design possibilities or is concerned that engineering plans can not be developed and the BMP installed in a single grant cycle the municipality may wish to submit an assessment application in order to develop such information for a subsequent implementation proposal.

If there is an ongoing roadwork project that is not going to be finished in FY04, is it possible to apply for FY04 CPR funding for associated stormwater remediation improvements?

Completion of roadwork does not have to be concurrent with BMP installation. As long as the installation of the stormwater BMP is completed by the end of the State fiscal year, the project is eligible. If the roadwork is an ongoing multi-year project, the applicant may wish to frame the proposal as a phased stormwater project in order to receive preference criteria points.

For the purposes of the application, what is applicable for matching funds?

Match can be, but is not limited to: funds from state or federal programs which are not being used as match for other projects (double counting), the cost of town employee services and equipment (in-kind), fair market cost of donated materials or services such as volunteer labor, the cost of developing Professional Engineering Plans if they were billed after June 30, 2005, and contributions in the form of charges for real property and non-expendable personal property specifically identifiable to the project. There is no preference given to municipalities that propose cash match over in-kind services or any combination of the two.

If a private party is going to provide an easement for a project, when does the easement need to be granted and does the easement need to be provided during the fiscal year to be counted as match?

The easement must be granted prior the project contract being awarded/signed. The easement is not required for the application, but a letter of commitment from the private party landholder should be provided. The cost or the fair market value of the easement is applicable for match at the time the easement is granted. CPR funds can not be used to acquire private land holdings.

Can any funding be provided up front for supplies or equipment?

No. This is a reimbursement program. Municipalities will be reimbursed for eligible costs associated with the awarded project. A City or town must demonstrate that it understands that this is a reimbursement program, and it must be prepared to expend municipal funds for the project prior to reimbursement.

Is sediment removal an acceptable BMP to remediate a bacteria problem in stormwater?

No. The program is not aware of any study that shows that only removing sediments from stormwater will effectively remove bacteria. Further treatment is generally needed for bacterial removal.

Does CZM have information regarding the performance of various stormwater BMPs?

Information regarding removal efficiencies and design considerations for the traditional stormwater BMPs (such as retention/detention ponds, wetlands, swales, infiltration) can be found in Volume 1: Stormwater Policy Handbook and Volume II: Stormwater Technical Handbook that were developed in a collaborative effort between CZM and the Department of Environmental Protection (DEP). The Handbooks are available at the state bookstore and on the web at <http://www.state.ma.us/dep/brp/www/wwpubs.htm>. Information regarding proprietary technology BMPs can be obtained from the vendor. Also, the Strategic Environmental Technology Partnership has information on a number of proprietary technology BMPs.

What type of sampling data is necessary to support an application?

Beach samples, source site water samples, shellfish samples, and fecal coliform sampling have all have been used in the past. The type of sampling necessary to support the application is dependent on the resource and the constituent of concern. Generally, several rounds of wet weather sampling may be sufficient to support an implementation application, but sampling is dependent on site and contamination characteristics. In order to support an implementation application, the applicant would need to provide sample data from the suspect source outfall pipe or the area immediately adjacent to the source. General water quality data such as Massachusetts Division of Marine Fisheries (DMF) classification sampling or the DEP 303(d) List of Waters may not be sufficient enough for an implementation proposal but may support an assessment proposal to identify the contamination source. If an applicant is considering an implementation project, and is reasonably confident as to the contamination source site, several rounds of wet weather sampling for inclusion in the application may be useful in supporting an implementation application.

What types of projects are eligible for funding as assessments?

In the past, assessment projects have included: water quality monitoring, shoreline survey and identification of suspect source sites, storm drain and contributing area delineation and investigation, and the development of engineering plan design. The goal of providing assessment grants is to provide for communities that do not have sufficient information to submit an implementation proposal, resources to investigate impacts to a receiving water in order to develop a subsequent implementation application. In past grant rounds, applications that have articulated the design of engineering plans as a project task were most successful.

What is the ratio of grants awarded for implementation vs. assessment grants?

There is no percentage set-aside for assessment vs. implementation projects. Both implementation and assessment applications are evaluated individually and ranked on the individual merit of the application. As such, the ratio of implementation vs. assessment awards varies annually.

Can a proposal address pollution in more than one (1) waterbody?

Yes. Any assessment plan should include an attempt to prioritize areas for remediation.

Who selects projects for funding?

A multi-agency review committee evaluates proposals on a competitive basis. Agencies participating in the selection process can be found within the RFR.

What criteria do you look for in selecting applications for funding? How are proposals scored?

The review committee uses the selection criteria found in the RFR to select projects for funding. A numerical scoring methodology is used and selection is based on how well the applicant has described and documented the project in the application.

Does an application for the implementation of a BMP that was funded through a previous assessment grant receive preference?

Yes, please refer to *Preference Criteria* listed in the RFR.

What type of projects are eligible for implementation funding?

The CPR program is designed to provide funding to mitigate pollution associated with stormwater runoff from municipal roadways. Applicants must demonstrate a specific pollution problem caused by stormwater and an associated natural resource impact. Proposals targeting sewage and/or flood mitigation are typically not eligible for funding.

Is wetland restoration eligible for funding?

No, although constructed wetland projects have been funded. These are projects that create a new wetland area for stormwater treatment.

Can a project use BMPs not yet approved by DEP?

The review committee will fund worthy proposals that meet all the eligibility criteria and use remediation techniques that will most likely succeed as proposed regardless of whether the BMP is included in the DEP Stormwater Management Handbooks.

Can a town submit more than one proposal?

Yes

Is funding for the development of municipal Stormwater Management Plans eligible for funding through the CPR program?

No. The development of stormwater management plans falls outside the eligibility criteria of the CPR program. Assessment applications that have been framed as town-wide stormwater management plans have not received funding. However, CZM Regional Coordinators and Coastal Nonpoint Program Staff work with municipalities on Stormwater Management Plan issues and may be contacted for assistance.

Are proposals that will fulfill a community's NPDES Phase II obligations, eligible for funding?

No. The CPR program is designed to remediate or investigate a specific stormwater pollution problem and not to meet any federal stormwater requirement.

Is an investigation to identify illegal sewer connections to storm drain lines eligible?

No. Any activity associated with illegal connections is not eligible for CPR funding.

Would the separation of Combined Sewer Outfalls (CSOs) be eligible?

No. However, after the systems were separated the municipality may apply for funds to mitigate pollution impacts from the stormwater system.

Are inland communities eligible to receive CPR grants?

Yes. All municipalities that are in the Massachusetts Coastal Watershed are eligible, as long as an application fulfills the requirements of the grant program.

Is the mitigation of stormwater impacts to ponds eligible?

Projects must address pollution sources impacting coastal waters or those waterbodies that discharge to coastal waters, which generally include brooks, streams, rivers and great ponds. The applicant must clearly demonstrate that the receiving waters drain to coastal waters. In this example, a pond that has a connection to coastal water via a stream may be eligible.

Is the repair of tide gates eligible for funding?

No. Unless the proposal can demonstrate a stormwater pollution problem and a natural resource impact associated with the tide gate malfunction, it is not eligible.

Are flood control proposals eligible for funding?

No. Again, unless the proposal can demonstrate a stormwater pollution problem and a natural resource impact associated with the flooding, it is not eligible.

Who can apply for CPR funds?

Municipalities in the Massachusetts Coastal Watershed are eligible to apply. A list of eligible municipalities is provided in Appendix A of the RFR. In past funding rounds, municipalities have partnered with non-profit or non-governmental agencies for the purpose of developing an application and managing a project. However, if a project is selected for funding, the municipality will be the recipient of the award and ultimately responsible for project completion.

Is there any cap or maximum amount for individual projects?

No.

If two municipalities share a resource water, can they submit a joint application and who would be the award recipient?

Yes, municipalities can co-sponsor an application. Preference criteria for a joint proposal is described in the RFR. It is the responsibility of the project proponents to articulate the responsibilities of each municipality including fiscal and contract management.

What are the reasons that projects have not been selected for funding in the past?

The most common reason that projects were rejected was that the BMP being proposed did not address the constituent of concern. Other reasons for applications being rejected were: the lack of water quality data; insufficient connection between the impactor and the resource; the proposed project was outside the eligibility criteria for the CPR program; or, the scope of the project was too large and it was unlikely that it could be completed by the end of the fiscal year.

Is there any selection preference given to implementation or assessment vs. vessel pump-out grants?

There is no specific monetary set-aside designated by project types. The projects are selected on a competitive basis.

Are communities that have received funding in past grant rounds eligible to apply for FY03 grant funding, and do they receive any type of preference?

Communities that have received funding in the past are eligible to receive additional funds from the FY04 grant round. If the community can demonstrate that the proposed project is part of a comprehensive stormwater management strategy, it will receive additional preference points.

Do you need to apply for an assessment grant prior to being awarded an implementation grant?

No. Communities are encouraged to develop applications for implementation projects. A community should only submit an application for assessment if it does not have sufficient information to warrant an implementation project.

Are communities that are considering submitting an assessment proposal required to provide all of the information outlined under "Assessment Funding" (RFR page 5)?

Not all communities are going to have all of the information requested in the RFR application. Applicants should provide information as available and incorporate investigations regarding missing information as part of the assessment.

Is there any assurance that a municipality that has received an assessment grant will be awarded a subsequent implementation grant?

No. The selection process is a competitive process and all grant awards are pursuant to funding under the bond cap. However, implementation proposals, which are informed by an assessment project, receive preference points.

Is the mapping of a storm drain system eligible for funding?

The mapping of a storm drain system may be eligible as a component of an assessment application provided the purpose of the assessment is to inform a subsequent BMP implementation proposal.

Is the purchase of equipment such as street sweepers or vacuum trucks eligible?

No.

Can stormwater BMPs be installed on non-municipal property?

No. Stormwater BMPs must be installed on public property and treat runoff from municipal roadways. However, if an easement were to be provided by the land owner to facilitate the project, the installation would be eligible. This is described in Project Eligibility.

If a municipality has received grant funding from another program for a given project, can the municipality seek funding through CPR to fund a sub-component of that project?

Funds from the CPR Program can be used to develop discrete portions of a larger project.

Is the FY04 Grant Round Schedule included in the RFR fixed?

The schedule provided in the RFR is a generalized schedule. If an application is selected for funding a Scope of Services and Schedule will be developed for the specific project taking into account specific tasks and deliverables.

Section 1 (Describe the Pollution Problem) of the application indicates that state standards recommend ½” to 1” of stormwater be treated. Will the evaluation committee reject an application if the applicant is not able to treat the recommended rainfall amount?

The State Stormwater Management standards indicate that, for discharges to critical resources, 1.0 inch of runoff should be treated and 0.5 inches for all other charges. As the vast majority of applications the program receives are for retrofit projects, the proponent should meet the standard to the *maximum extent practicable* and should design the system to improve existing conditions based on site constraints. If the applicant is not able to meet the stormwater standard due to site constraints, an explanation of limiting factors is recommended.

Have there been any significant changes in the application process from previous years?

No.

Does a community need to be housing certified in order to apply to the program?

No.

Do certain types of remediation technologies (BMPs) receive preference?

No. The community is responsible for recommending the BMP for the project and that selection should be based on the constituent of concern and situation being addressed. Marc MacQueen, Natural Resources Conservation Service (NRCS) MassCAP program, has expertise in BMP selection and communities with questions regarding BMP selection should contact him at (508) 295-1481. He and other Technical Assistance Contacts (TACs) are able to provide assistance and guidance throughout the RFR application process. Contact information for Marc and other TACs is listed in Appendix A of the RFR.

Is any portion of the evaluation weighted due to importance?

Sections 1, 2, and 3 are weighted due to their importance. Additional point values are given to projects that include conditions found in *Preference Criteria*.

Would a Best Management Practice (BMP) to a boat ramp and parking lot be eligible?

Yes, provided that the boat ramp was municipally owned and the applicant was able to demonstrate that the parking lot and boat ramp were the source of non-point sources pollution impacting the receiving waters.